
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre
 :
 v. : Mag. No. 19-8331
 :
 YUAN HUA CHIN, : **CRIMINAL COMPLAINT**
 a/k/a "Larry Chin" :
 :

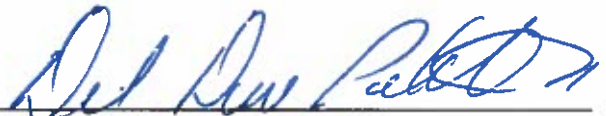
I, Dino Polichetti, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the United States Drug Enforcement Administration and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:


Dino Polichetti, Special Agent
U.S. Drug Enforcement Administration

Sworn to before me and subscribed in my presence,
October 2, 2019 in Newark, New Jersey

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Aggravated Identity Theft)

On or about November 15, 2017 through on or about October 1, 2019, in Bergen County, in the District of New Jersey and elsewhere, defendant

YUAN HUA CHIN,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation of a provision enumerated in 18 U.S.C. § 1028A(c), to wit bank fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

ATTACHMENT B

I, Dino Polichetti, am a Task Force Officer with the United States Drug Enforcement Administration ("DEA"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers and witnesses, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement has been investigating YUAN HUA CHIN ("CHIN"), since in or around October 2018, for his unlawful use of a victim's personal identifying information ("Victim-1").

2. During the investigation, law enforcement learned that on or about November 15, 2017, CHIN filed a certificate of formation (the "Certificate") with the New Jersey Department of the Treasury for a brokerage firm (the "Firm").

3. The Certificate lists defendant CHIN and Victim-1 as both members and managers of the Firm. Additionally, Victim-1 is presented as a signer of the document via an authorized representative.

4. On or about October 12, 2018, Victim-1 reported to his local law enforcement that his personal identifying information was used without his permission to establish a LLC in New Jersey. Victim-1 further reported that his personal identifying information was also used in an attempt to create a bank account without his permission.

5. On or about October 1, 2019, law enforcement responded to CHIN's residence and conducted a lawful search of it in CHIN's presence. Law enforcement recovered numerous financial documents related to the Firm, including bank records, tax forms, and business cards in CHIN's name.

6. In a *post-Miranda* statement, CHIN admitted:

- a. that he used Victim-1's personal identifying information without his permission to establish the Firm because Victim-1 had superior credit;
- b. that he confessed his unauthorized use of Victim-1's personal identifying information to Victim-1.
- c. that he established bank accounts related to the Firm; and

- d. that he used the Firm's bank accounts to pay for his personal expenses.